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August 23, 2018

BY ECF

Hon. Roanne L. Mann
United States Magistrate Judge
United States District Court for the Eastern District of New York
United States Courthouse
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Lelchook, et al v. Islamic Republic of Iran, et al*
1:16-cv-07078-(ILG)-(rlm)

Dear Judge Mann,

Per the Court's minute order of August 22, 2018, the parties have conferred about proposed language and have reached agreement about most substantive issues. Mr. Frey still objects to the inclusion of proposed section 1(c), but plaintiffs believe that language to be important and appropriate.

Respectfully,


Robert J. Tolchin

cc: All counsel of record by ECF